

**IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

JENNIFER GALLAGHER

:

Plaintiff

:

v.

:

CIVIL ACTION

NO. 13-1103 (JEI/AMD)

JOHN M. MAKOWSKI, ESQUIRE;  
PLUMBERS LOCAL UNION 690  
SUPPLEMENTAL RETIREMENT  
PLAN; THOMAS J. McNULTY;  
JOHN I. KANE; THOMAS J.  
CROWTHER; TIMOTHY  
J. BRINK; HOWARD WEINSTEIN;  
JOHN J. BEE

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Removed from Superior Court of  
New Jersey, Burlington County,  
Law Division, Docket No. BUR-L-2873-12

Defendants

**Plaintiff's Notice of Cross-Motion for  
Partial Summary Judgment Against  
the Plumbers Local Union 690  
Supplemental Retirement Plan and  
Individual Plan Defendants**

To: Liam Braber, Esquire  
Jacoby Donner, P.C.  
1700 Market Street, Suite 3100  
Philadelphia, PA 19103

PLEASE TAKE NOTICE that on January 6, 2014 or as soon thereafter as counsel may be heard, the undersigned attorney for plaintiff Jennifer Gallagher shall move before the Honorable Joseph E. Irenas, U.S.D.J., at the Mitchell H. Cohen Building and U.S. Courthouse, Courtroom 5A, 4th and Cooper Streets, Camden, New Jersey, 08101, for an Order granting partial summary judgment in favor of the plaintiff and against defendants Plumbers Local Union 690 Supplemental Retirement Plan, Thomas J. McNulty, John I. Kane, Thomas J. Crowther, Timothy J. Brink, Howard Weinstein and John J. Bee in the sum of \$24,856.81 plus pre-judgment interest and counsel fees and costs to be determined by the Court upon application of

plaintiff's counsel.

PLEASE TAKE FURTHER NOTICE that in support of said Cross-Motion, plaintiff will rely on the Brief, Appendix, Local Rule 56.1 Statement of Undisputed Facts, Response to defendants' Statement of Facts and Certification of Joseph M. Pinto, Esquire (included in Appendix).

POLINO and PINTO, P.C.

By: /s/ Joseph M. Pinto  
Joseph M. Pinto, Esquire  
Attorney for Plaintiff

Date: December 20, 2013